

**IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

BRIAN ECKART,

Plaintiff,

vs.

CEREN ERCANTURK, UBER
TECHNOLOGIES, INC. and RAISER, LLC,

Defendants.

Case No.: 2:24-cv-06400-RMG

**PLAINTIFF'S RULE 26(A)(2)
DISCLOSURES**

Plaintiff, Brian Eckart, hereby submits his expert disclosures as required by Fed. R. Civ. P. 26(a), the Court's Case Management and Scheduling Order, and Fed. R. Civ. P. 6(a)(1)(B). Plaintiff discloses the following expert witnesses who are expected to be called to offer opinions and testify at trial:

1. RADIOLOGIST

David S. Owens, MD
Radiology Consultation Services, PC
4545 Harris Trail, NW
Atlanta, GA 30327

Dr. Owens is a treating physician and retained expert who is expected to testify on behalf of the Plaintiff regarding his interpretations of Plaintiff's diagnostic studies and will provide opinions on causation, diagnoses, prognosis, impairment, permanency, disability, and aggravation of any preexisting conditions within a reasonable degree of medical probability/certainty. Dr. Owens is the radiologist who interpreted the magnetic resonance imaging of Plaintiff's brain in the course of treatment of Plaintiff and was retained to provide his opinions regarding the magnetic resonance imaging of Plaintiff's spine. In his role as a treating physician, Dr. Owens is expected to testify regarding his opinions of the imaging consistent with Dr. Owens' medical records. In addition, this physician, based upon his education, training, experience, the history obtained, the

medical records reviewed, and the diagnostic studies reviewed, will testify that the trauma sustained by Plaintiff in the subject motor vehicle crash caused injuries which are permanent in nature.

Reports from this expert with the contents required by Fed. R. Civ. P. 26(a)(2)(B) were provided to Defendants and their counsel on September 2, 2025.

2. LIFE CARE PLANNER

Paul K. White, MD
MD LCP, LLC
171 Huntington Rd. NE
Atlanta, GA 30309

Dr. White was retained by Plaintiff to prepare a life care plan for Plaintiff's future medical needs and medical expenses resulting from the injuries sustained in the subject collision. Dr. White will offer opinions within a reasonable degree of medical probability on the Plaintiff's future medical needs and the reasonable costs of the same.

Reports from this expert with the contents required by Fed. R. Civ. P. 26(a)(2)(B) were provided to Defendants and their counsel on September 2, 2025.

In addition to the retained experts above, Plaintiff reserves the right to call his treatment providers as witnesses pursuant to Fed. R. Civ. P. Rule 26(a)(2)(C). Plaintiff anticipates that his treatment providers will qualify as experts by knowledge, skill, experience, training, or education, and Plaintiff reserves the right to elicit testimony regarding each provider's opinions, if any, regarding the cause, diagnosis, treatment, and prognosis of Plaintiff's injuries. Plaintiff's treating providers who may be called to testify at trial and are known at this time are as follows:

3. Syed Asad, MD

Syed Asad is a neurologist who has provided treatment for Plaintiff's brain injury following this crash. Dr. Asad is expected to testify regarding his treatment of Plaintiff's brain injury, his opinions regarding causation of Plaintiff's brain injury, and his recommendations for future care, consistent with Dr. Asad's medical records.

4. Javid Baksh, DO

Dr. Javid Baksh is a pain medicine physician who has provided treatment for Plaintiff's spinal injuries following this crash. Dr. Baksh is expected to testify regarding his treatment of Plaintiff's spinal injuries, his opinions regarding the causation of Plaintiff's spinal injuries, and his recommendations for future care, consistent with Dr. Baksh's medical records.

Plaintiff reserves the right to elicit expert testimony from individuals named as experts by other parties or treating physicians and medical care providers to this case. Plaintiff further reserves the right to supplement this disclosure later should the case develop in such a way to warrant additional expert testimony on Plaintiff's behalf.

MORGAN & MORGAN, P.A.

/s/ Cooper Klaasmeyer

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Attorneys for the Plaintiff

Charleston, South Carolina
September 2, 2025